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United Airlines Inc., a Delaware
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ANGELA PULLIAM,

Plaintiff,

vs.

UNITED AIRLINES INC., a Delaware
Corporation

Defendant.

Case No. : 10-cs-1406

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

**[SPECIAL SCHEDULING REVIEW
REQUESTED]**

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 26-1(d), Defendant UNITED AIR LINES, INC. (“Defendant”) and Plaintiff, ANGELA PULLIAM (“Plaintiff”), through their respective counsel, submit the following Stipulated Discovery Plan and Scheduling Order.

(1) Discovery Cut Off Date. The parties request a discovery period of two hundred and forty (240) days from October 1, 2010, the date Defendant’s Answer was received. The discovery period, therefore, will close on **May 30, 2011**. The reason the parties request a discovery period of two hundred and forty (240) days is that Defendants’ counsels’ colleague from their law firm will be on maternity leave from approximately late-January to late-April 2011, and Defendants’ counsel will be covering her case load during this time. Accordingly, a longer discovery period is requested because if discovery is set for the standard one hundred and eighty (180) days, discovery would end during the middle of Defendants’ counsels’ colleague’s

maternity leave, while Defendants' counsel are covering her case load as well as their own.

(2) The parties will make their Initial Disclosures on or before **November 12, 2010**. Counsel for the parties met and conferred on October 28, 2010. No changes need to be made in the timing, form or requirements for such disclosures.

(3) Amending the Pleadings and Adding Parties. The date for filing motions to amend the pleadings or to add parties shall be ninety (90) days prior to the close of discovery: **March 1, 2011**. Any party causing additional parties to be joined or brought to this action shall contemporaneously therewith cause a copy of this Order to be served upon the new party or parties.

(4) Expert Witness Disclosures. The disclosure of any expert witnesses shall be made sixty (60) days before the discovery deadline: **March 30, 2011**. The disclosures of any rebuttal experts shall be due thirty (30) days after the initial disclosures of experts: **April 29, 2011**. The requirements of F.R.C.P. 26(a)(2)(B) shall apply to any such disclosures.

(5) Dispositive Motions. Dispositive motions shall be filed not later than thirty (30) days after the discovery cut-off date: **June 29, 2011**.

(6) Pretrial Order. The Joint Pretrial Order (including Rule 26(a)(3) disclosures) shall be filed not later than thirty (30) days after the date set for filing dispositive motions: **July 29, 2011**. However, in the event that dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after a decision on the dispositive motions or further order of the Court.

(7) Electronically Stored Information. The parties prefer to handle these issues on an ad hoc basis as no consensus can be reached in advance.

(8) Protection of Privileged/Trial Preparation Materials. The parties prefer to handle these issues on an ad hoc basis as no consensus can be reached in advance.

(9) Subjects on Which Discovery Will be Conducted. No changes should be made on the limitations of discovery imposed under Federal Rules of Civil Procedure or local rules.

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Discovery does not need to be conducted in phases or limited or focused on particular issues.

DATED this 11th day of November, 2009.

DATED this 11th day of November, 2009.

/s/ James P. Kemp
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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

Dated: Dec. 7, 2010

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